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March 3, 2003

RECEIVED

MAR 03 2003

PUBLIC SERVICE
COMMISSION

Thomas M. Dorman
Public Service Commission
211 Sower Blvd.
P. O. Box 615
Frankfort, KY 40601

2003-00098
Re: In the Matter of: (i) Brandenburg Telecom LLC, (ii) North Central Communications, Inc., and (iii) South Central Telcom, LLC v. Kentucky ALLTEL, Inc. - before the Public Service Commission of the Commonwealth of Kentucky

Dear Mr. Dorman:

Enclosed for filing with the Public Service Commission of the Commonwealth of Kentucky is an original and eleven (11) copies of the Formal Complaint of (i) North Central Communications, Inc., (ii) South Central Telcom LLC, and (iii) Brandenburg Telecom LLC against Kentucky ALLTEL, Inc.

Please return a file stamped copy in the self-address postage prepaid envelope furnished herewith.

Thank you, and if you have any questions, please call me.

Very truly yours,

DINSMORE & SHOHL LLP



John E. Selent

JES/bmt
Enclosures
79289vt
30256-100

Charleston WV • Cincinnati OH • Columbus OH • Covington KY
Dayton OH • Lexington KY • Louisville KY • Nashville TN • Pittsburgh PA

**COMMONWEALTH OF KENTUCKY
BEFORE THE PUBLIC SERVICE COMMISSION**

In the Matter of :

BRANDENBURG TELECOM LLC,)	
NORTH CENTRAL)	
COMMUNICATIONS, INC., and)	
SOUTH CENTRAL TELCOM LLC)	
Complainants)	
)	
v.)	Case No. _____
)	
KENTUCKY ALLTEL, INC.)	
Defendant)	

FORMAL COMPLAINT

Brandenburg Telecom LLC ("BTLLC"), North Central Communications, Inc. ("NCC"), and South Central Telcom LLC ("SCTLLC") (collectively, "the CLEC's"), by counsel, for their formal complaint against Kentucky ALLTEL, Inc. ("ALLTEL"), pursuant to KRS 278.260, hereby state as follows.

1. The full name and address of BTLLC is Brandenburg Telecom LLC, 502 W. Dixie Avenue, Elizabethtown, Kentucky 42701. BTLLC is a competitive local exchange carrier offering the full spectrum of broadband services in the Elizabethtown, Kentucky marketplace.

2. The full name and address of NCC is North Central Communications, Inc., 872 Highway 52 Bypass East, Lafayette, Tennessee 37083. NCC is a competitive local exchange carrier offering the full spectrum of broadband services in the Scottsville, Kentucky marketplace.

3. The full name and address of SCTLLC is South Central Telecom LLC, 1399 Happy Valley Road, Glasgow, Kentucky 42141. SCTLLC is a competitive local exchange carrier offering the full spectrum of broadband services in the Glasgow, Kentucky marketplace.

4. The full name and address of ALLTEL is Kentucky ALLTEL, Inc., P.O. Box 1650, Lexington, Kentucky 40588. ALLTEL is an incumbent local exchange carrier offering local exchange services in the Elizabethtown, Scottsville, and Glasgow marketplaces (among others). ALLTEL also has a publishing division ("ALLTEL Publications") whose primary responsibility is to publish a telephone book that provides directory listing information for all working telephone numbers (except non-published and unlisted numbers) in ALLTEL's service territory.

5. The facts supporting this complaint are set forth more fully below; but briefly, this complaint concerns a directory database problem that is causing the CLEC's directory information to either not appear or to appear incorrectly in the directory databases that are to be published in ALLTEL's telephone directories and that will be used to provide directory assistance services to subscribers in the Elizabethtown, Scottsville, and Glasgow markets.

Applicable Law

6. KRS 278.030(2) provides that "[e]very utility shall furnish adequate, efficient and reasonable service, and may establish reasonable rules governing the conduct of its business and the conditions under which it shall be required to render service."

7. 807 KAR 5:061 §5(1) provides that "[t]elephone directories shall be published at least yearly for each exchange listing the name, location and telephone numbers of all customers, except public telephones and numbers unlisted at customer request, which can be called within the service area without a long distance charge."

8. 807 KAR 5:061 §5(6) provides, in relevant part, that "[i]n the event of an error or omission in the name listing of a customer, such customer's correct name and telephone number

shall be in the files of information or intercept operators and the correct number furnished the calling party either upon request or interception."

9. The CLEC's have interconnection agreements with ALLTEL that provides as follows.

Additional Services Attachment

4. Directory Listing and Directory Distribution

4.1 To the extent required by Applicable Law, [ILEC] will provide directory services to [CLEC]. Such services will be provided in accordance with the terms set forth herein. Directory listing services shall be provided pursuant to [ILEC's] applicable tariffs, provided however, that no charge applies for directory listing services on newly ported numbers.

4.2 As used herein, "Listing Information" means a [CLEC] Customer's primary name, address (including city, state and zip code), [and] telephone number(s).... "Listing Information" also includes all information provided to [ILEC] for placement in [ILEC's] applicable Directory Assistance database.

...

4.4 [ILEC] shall include each [CLEC] Customer's Primary Listing in the directory listing database.... "Primary Listing" means a Customer's primary name, address, and telephone number....

...

4.7 Both Parties shall use commercially reasonable efforts to ensure the accurate publication of [CLEC] Customer listings. At [CLEC's] request, [ILEC] shall provide [CLEC] with a report of all [CLEC] Customer listings normally no more than ninety (90) days and no less than thirty (30) days prior to the service order close date for the applicable directory. [ILEC] shall process any corrections made by [CLEC] with respect to its listings, provided such

corrections are received prior to the close date of the particular directory.

Factual Background

10. The CLEC's began operations in their respective Kentucky markets in early- to mid-2002, when Verizon owned the present-ALLTEL properties. In order to sign up new customers, the CLEC's would submit service orders to Verizon by filling out a local service request ("LSR"), which contained directory listing information for the customer ordering new service.

11. Verizon processed these LSR's and utilized the included directory information to update their directory databases.

12. When ALLTEL took over the properties, the CLEC's began submitting LSR's to ALLTEL using ALLTEL's specified method for submitting those orders. According to ALLTEL, it uses the CLEC's LSR's to process the new service orders and to update their directory databases.

13. ALLTEL has not informed the CLEC's that their LSR's have been submitted in an improper fashion, in contravention of their interconnection agreements with ALLTEL, or otherwise in a format not acceptable to ALLTEL. In fact, if this were the case, ALLTEL would not even process the initial order. Therefore, because the CLEC's orders are generally being properly completed, it follows that the CLEC's LSR's are being properly submitted.

14. According to ALLTEL's stated practice, then, ALLTEL should have been using the listing information in the CLEC's LSR's to update its directory databases.

15. Starting in August, however, after the properties transitioned from Verizon to ALLTEL, the CLEC's began experiencing problems with directory assistance providers providing inaccurate or no directory assistance information for the CLEC's new customers. This

occurred regardless of whether the directory assistance call was placed from a CLEC-serviced telephone line or an ALLTEL-serviced telephone line.¹

16. As the CLEC's gained access lines, these problems became more and more common. Therefore, the CLEC's approached ALLTEL (as the database administrator for the CLEC's directory assistance listings) with questions about whether ALLTEL's directory assistance database was accurate and complete.

17. In response to these concerns, ALLTEL requested that the CLEC's identify any specific directory assistance errors that they were encountering, and ALLTEL would attempt to correct them in its database. For several weeks, the CLEC's did this.

18. The problems continued, however, and on September 30, 2002, BTLLC provided ALLTEL with a large list of specific mistakes in ALLTEL's directory assistance database, and it asked ALLTEL to correct the problems as soon as possible. *See* September 30, 2002 e-mail from Mr. Bradley to Mr. Dolan, attached as Exhibit 1 to this complaint.

19. Approximately one month later, BTLLC again contacted ALLTEL with continued problems of the same type. Many of the specific directory assistance problems identified in the e-mail attached as Exhibit 1 to this complaint still had not been fixed, and problems had begun to mount in a more extreme fashion. In fact, by this time, BTLLC alone had close to 200 directory assistance problems that needed to be corrected. *See* November 8, 2002 e-mail from Mr. Bradley to Mr. Dolan, attached as Exhibit 2 to this complaint.

¹ The CLEC's use BellSouth as their directory assistance provider. BellSouth, in turn, queries directory listing information from a company called LSSI. However, because ALLTEL does not use LSSI for its directory assistance services, LSSI does not have its own record of ALLTEL's directory assistance database. In order to provide directory assistance information to BellSouth (who, in turn, provides it to the CLEC's), LSSI must query the directory assistance information stored by First Data, which is ALLTEL's directory assistance provider. By calling from an ALLTEL-serviced telephone line, however, the CLEC's are able to remove all the "middle men" from the chain and directly verify whether ALLTEL is providing its own directory assistance provider, First Data, with accurate directory assistance listings. ALLTEL was repeatedly notified that in neither case were the CLEC's receiving accurate directory assistance listings from the directory assistance providers.

20. These problems were not, however, restricted to BTLIC; all of the CLEC's had been experiencing similar problems during this time, and their frustration was growing. *See* January 2003 OSS Update Report filed in Case No. 2001-399 at para. 2 (noting that "several CLEC's requested the ability to proof information submitted to ALLTEL's directory through ALLTEL Express"); *see also* January 9, 2003 e-mail from Ms. Rich to Mr. Dolan, attached as Exhibit 3 to this complaint; *see also* February 3, 2003 e-mail from Ms. Rich to Mr. Dolan, attached as Exhibit 4 to this complaint.

21. Yet, despite the fact that the CLEC's had, for months, provided ALLTEL with specific information regarding the directory assistance listings that needed to be promptly corrected, ALLTEL consistently failed to correct more than a handful of the existing errors at a time.

22. ALLTEL ultimately responded that the CLEC's had all along failed to give ALLTEL information sufficient to reveal that the source of the problem lay with ALLTEL itself.

23. This position is questionable in light of the facts that: (1) there was no problem with the CLEC's original submissions of their directory information; (2) the CLEC's had, for months, been providing ALLTEL with specific lists of customers for whom directory assistance listing information was incorrect; and (3) the CLEC's had clearly informed ALLTEL (on several occasions) that they had made numerous unsuccessful attempts to verify the accuracy of their directory assistance listings by using an ALLTEL-serviced telephone line.

24. The CLEC's concerns were not, however, limited only to directory assistance. With the impending publication of the white page directories, the CLEC's recognized that inaccuracies in ALLTEL's directory listing database would result in the publication of an inaccurate white pages directory. And thus, by virtue of switching service to a CLEC, the

CLEC's customers will be incorrectly listed in the telephone directory that callers and customers use to locate them.

25. Accordingly, in an effort to prevent this catastrophe before it occurred, the CLEC's began requesting, from ALLTEL, alpha proofs of the white page listings that will be included in the new telephone directories. ALLTEL refused to provide the proofs, noting that problems in the feeds to ALLTEL's Distributed Customer Record Information System ("DCRIS")² database were preventing them from creating an accurate directory listing database (for the publication of ALLTEL's telephone directory). See February 3, 2003 letter from Mr. Dolan to Mr. Bradley, attached as Exhibit 5 to this complaint.

26. Rather than provide the alpha proofs as requests, however, ALLTEL Publications provided a DCRIS summary of an "audit log report" listing BTLLC's customers. This log — over a thousand pages of what appeared to be screen prints of ALLTEL records — was provided to BTLLC in no order whatsoever, thereby rendering it virtually meaningless as a tool to verify the accuracy of the white pages directory soon to be published by ALLTEL.

27. Despite the work involved, BTLLC reviewed and identified over three hundred (300) errors in the material provided by ALLTEL. See January 10, 2003 letter from Mr. Bradley to Mr. Dolan, attached as Exhibit 6 to this complaint. And to make the magnitude of its concerns clear to ALLTEL, Brandenburg Telecom wrote to ALLTEL warning that if it did not — prior to February 28, 2003 — receive the requested alpha proof reflecting the corrections that ALLTEL had been instructed to make, then it would have no choice but to file a formal complaint with the Commission. See February 12, 2003 letter from Mr. Bradley to Mr. Dolan, attached as Exhibit 7 to this complaint.

28. In addition, in light of the mistakes in this "audit log report," the CLEC's also asked ALLTEL about the accuracy of the yellow page listings to be included in ALLTEL's upcoming telephone directories. The accuracy of these yellow page listings is crucial to the CLEC's business customers.

29. ALLTEL, however, has claimed that because its yellow pages directory database is somehow locked in a "battle" with Verizon, it cannot make its yellow page listings available to the CLEC's at this time.³

30. ALLTEL claims that Verizon is at fault for any inaccuracies that may exist in the yellow page listings. This claim is illogical, however, because Verizon receives its yellow page listings from ALLTEL's directory listing database. And, the CLEC's have verified that the directory listing updates that Verizon receives from ALLTEL do not include the CLEC's yellow page listings.

31. Thus, regardless of whether ALLTEL's failure to provide the CLEC's yellow page listings is a product of an inaccurate database or an attempt to sabotage the competitive viability of Verizon's directory publishing division (while at the same time sabotaging the CLEC's), ALLTEL's activity is inexcusable.

32. And as if this problem were not enough of a concern for the CLEC's, the accuracy of ALLTEL's directory assistance listings had likewise not improved during this time. Thus, on February 5, 2003, after ALLTEL still had not undertaken any serious effort to correct its directory assistance problems, and as a result of the CLEC's compounding frustration that ALLTEL apparently had not escalated this matter internally, the CLEC's escalated this issue on

² DCRIS is a system that extracts the CLEC's directory information from the LSR's submitted through ALLTEL Express. The directory information in DCRIS is subsequently fed into ALLTEL's distinct databases for directory assistance (411 service) and directory listings (telephone directories).

³ Verizon intends to publish a telephone directory to compete against ALLTEL's own telephone directory.

their own initiative. *See* February 5, 2003 e-mail exchange between Ms. Bodamer and Mr. Weeks, attached as Exhibit 8 to this complaint. ALLTEL responded that it would look into the matter. *See id.*

33. Nearly a week later, having heard nothing further from ALLTEL, the CLEC's again contacted ALLTEL about the possible causes of and resolutions to ALLTEL's directory assistance problems. *See* February 11, 2003 e-mail from Ms. Bodamer to Mr. Weeks, attached as Exhibit 9 to this complaint.

34. The CLEC's have discovered that part of their directory assistance problem is that ALLTEL is apparently refusing to direct First Data to share its directory assistance database with LSSI, which provides directory listing information to BellSouth Telecommunications Inc. ("BellSouth"), the CLEC's directory assistance provider.

35. Of course (as the problems with directory assistance information indicate), it does not appear that ALLTEL is accurately entering the CLEC's directory information into First Data's database. Accordingly, there is presently little to be gained by requiring ALLTEL to direct First Data share ALLTEL's directory assistance information with LSSI. Nevertheless, assuming that ALLTEL ultimately corrects (or is ordered to correct) the problems with the system by which CLEC directory information is entered into its directory assistance database, it will become crucial that ALLTEL's directory assistance listings are made available for use by the CLEC's directory assistance providers.

36. As a practical matter, if ALLTEL does not direct First Data to share its directory assistance database with LSSI, then the CLEC's will be forced to bear the undue burden of: (1) negotiating a new directory assistance agreement to address this situation; or (2) accepting the

directory assistance inaccuracies caused by ALLTEL's refusal to share the CLEC's directory assistance listings with the CLEC's directory assistance provider.

Count I

**Breach of Interconnection Agreement and Violation of KRS 278.030(2)
and 807 KAR 5:061 §5(6)**

37. ALLTEL has failed to maintained accurate and current records of the CLEC's customer listing information, including those customers' addresses and telephone numbers.

38. ALLTEL knows that by failing to maintain accurate and current records of the CLEC's customer listing information, end-users will not choose to receive local exchange service from the CLEC's because of the inaccurate perception that the CLEC's cannot provide adequate directory listing and directory assistance services.

39. In addition, ALLTEL has also deliberately refused to direct First Data to share its directory assistance database with LSSI, which provides directory assistance information to the CLEC's directory assistance provider, BellSouth.

40. ALLTEL knows that by refusing to direct First Data to share its directory assistance database with LSSI, the CLEC's will be unable, through their existing directory assistance provider, to provide accurate directory assistance services to their end-users.

41. As a result of these actions and this unreasonable service, ALLTEL has breached sections 4.1, 4.4, and 4.7 of its interconnection agreements with the CLEC's, violated KRS 278.030(2), and violated 807 KAR 5:061 §5(6).

42. Moreover, by failing to maintain accurate and current records of the CLEC's customer listing information and by refusing to direct First Data to share its directory assistance database with LSSI, ALLTEL has caused the CLEC's to suffer irreparable injury and damage to

their reputation in the community, thereby restricting their ability to bring effective competition to the local exchange carrier marketplace.⁴

43. Without intervention by the Commission, facilities-based competition in the Elizabethtown, Scottsville, and Glasgow markets will fail before it has had a chance to benefit these communities.

WHEREFORE, the CLEC's respectfully request that the Commission take the following actions:

- a. Order ALLTEL to immediately correct all of the CLEC's directory listings that are not accurately entered into the directory databases that are used to publish ALLTEL's telephone book and to provide ALLTEL directory assistance;
- b. Order ALLTEL to immediately direct First Data to share ALLTEL's directory assistance database with LSSI and any other company that provides directory assistance information to the CLEC's directory assistance providers;
- c. Order ALLTEL to provide the CLEC's with an alpha proof of their directory listings within five (5) business days of a request by the CLEC's, provided that such requests shall not be made more than once per month; and

⁴ Incidentally, the CLEC's did not encounter directory listing problems of anything approaching this magnitude when Verizon formerly controlled these territories.

- d. Order ALLTEL to provide a method for the timely verification of the CLEC's business subscribers' yellow page directory listings and yellow page heading placement.

Respectfully submitted,



John E. Seibert
Edward T. Depp
DINSMORE & SHOHL LLP
1400 PNC Plaza
500 W. Jefferson Street
Louisville, KY 40202
(502) 540-2300

**COUNSEL TO BRANDENBURG TELECOM LLC,
NORTH CENTRAL
COMMUNICATIONS, INC., and
SOUTH CENTRAL TELCOM LLC**

79045v1
30039-1

DEPP, Edward

From: Randall Bradley [rbradley@bbtel.com]
Sent: Monday, September 30, 2002 4:41 PM
To: Jimmy Dolan
Subject: DA Problems



Sept30411
Issues.xls

Jimmy,

We checked 21 DA listings from an Alltel line today and we are still not getting the correct information. These were all done from an Alltel line so if they were in your database we should have been able to get this from DA. There is no pattern for which #'s are in and which are not. Give me a call to discuss this situation further. Thanks.

--
Randall Bradley
Brandenburg Telephone Company
270-422-2121

DEPP, Edward

From: Randall Bradley [rbradley@bbtel.com]
Sent: Friday, November 08, 2002 12:03 PM
To: Jimmy Dolan; tana.henson@alltel.com; chery.holt@alltel.com
Cc: vspink@bbtel.com
Subject: DA Problems



AlltelDAproblemsall1
10802.xls

To All:

Enclosed is an excel spreadsheet that lists every number that we have a DA problem with. The first bunch stems from Verizon in that they listed Lexington as the address instead of Elizabethtown. The rest come from after Alltel took over. Most of these problems seem to be with our NXX 270-982. I believe the processes for getting ported numbers in the DA are working, but I still believe there's a problem with our NXX getting into the DA.

All of these had problems from our Bellsouth DA line. Several of these were already sent to you guys on other lists, but this is the comprehensive list that was just completed. Therefore, these are still not corrected totally.

Would you please correct these listings? If you have any questions or have any problems with these, please let me know. Thanks.

--

Randall Bradley
Brandenburg Telephone Company
270-422-2121

DEPP, Edward

From: larich71@nctc.com
Sent: Thursday, January 09, 2003 2:16 PM
To: Jimmy Dolan
Cc: Eileen Bodamer; Johnny McClanahan
Subject: Alltel DA Check Results.xls



Alltel DA Check
Results.xls

Jimmy--

I have just completed another DA check for our 239#s that are supposed to be out in Alltel's directory assistance. You will see that not much has been resolved, corrected, or changed since I checked it last on 11/29/02. I should note that this listing that I have been checking only has the active numbers up through the end of October 2002.

I also want to point out one additional item. I had been told that, for all non-pub numbers, we are supposed to be receiving a recording to indicate the number is non-pub. Out of all 29 non-pub numbers, only once did I get the non-pub recording.

Johnny McClanahan is faxing me an updated list of all of our 239 customers. Once I receive that fax, I'll check the remaining numbers to see where we stand on those directory wise.

If you have any questions regarding this, please call me at 270-622-7500.

Thank you for your time!

Leigh Anne Rich
Customer Service Supervisor, Scottsville office

DEPP, Edward

From: larich71@nctc.com
Sent: Monday, February 03, 2003 12:47 PM
To: Jimmy Dolan
Cc: Eileen Bodamer; Johnny McClanahan
Subject: Alltel DA Results010903.xls



Alltel DA
Results010903.xls

Jimmy--

I have just concluded a check of an updated listing of our 239#s. To say that I am not happy about the results could possibly be the understatement of the year thus far. Out of 43 numbers, only 4 were ok---ONLY 4!

My question is this: If I am taking the time to do a directory order for every 239 number that we process, then why can Alltel not process that order correctly? Jimmy, some of these numbers have been active for 2-1/2 months.

Please look over the attached document. If there is something that I need to differently, please feel free to let me know.

Leigh Anne Rich
Customer Svc. Supervisor, Scottsville

ALLTEL COMMUNICATIONS

1 Allied Drive
LIVE OAK, AR 72022

Jimmy Dolan
Account Manager
Wholesale Services

501-905-7873
531-267-3092 cfm
jimmy.dolan@alltel.com

February 3, 2003

VIA Certified Mail

Mr. Randall Bradley
Brandenburg Telecom, LLC
502 West Dixie Avenue
Elizabethtown, KY 42702-1147

RE: Directory listings

Dear Mr. Bradley:

This is in response to your letter dated January 10, 2003 in which you expressed concern over the status of directory listings for Brandenburg's Elizabethtown customers.

At this time ALLTEL continues to use Verizon's directory database for white and yellow page listings. The ALLTEL/Verizon contract will expire on October 16, 2003. The listings that are contained in the Verizon database are listings that existed prior to August 1, 2002. Listings that have been added since then are present in ALLTEL's DCRIS system and will be sent to Verizon for publication. ALLTEL is experiencing problems with the new ALLTEL database due to some technical and conversion issues and hopes to have the problems resolved by the end of February. Once the new ALLTEL Publishing database is operational all of the white and yellow page listings will be converted from the Verizon database to the ALLTEL database. ALLTEL has requested alpha proofs from Verizon and has offered to pay for alpha proofs but Verizon has denied those requests.

Brandenburg received a DCRIS report on December 20, 2002. You had noted that there were over 300 errors in the report. Brandenburg submitted 326 errors for correction. There were 96 errors that had either already been corrected or required a new LSR to be issued by Brandenburg. The remaining errors were due to keying errors and incorrect information that converted to ALLTEL from Verizon. All of these errors have been corrected and should be reflected on the latest DCRIS report that was sent to Brandenburg on January 31, 2003. Brandenburg will continue to have the ability to make corrections, if necessary, to the DCRIS report through ALLTEL Express or ALLTEL will continue to work directly with Brandenburg to insure directory listing corrections are made.

This issue also effects ALLTEL ILEC. Until the problems are resolved ALLTEL Publishing is unable to sell directory services to its own customers and provide alpha proofs to ALLTEL service centers. ALLTEL clearly understands the importance of providing correct directory listings for all customers and is working diligently to accomplish that objective.

Sincerely,

Jimmy Dolan

cc: L. Hughes
T. Henson
C. Flanagan

at
recept.
-00100100**BRANDENBURG TELECOM, LLC**

502 West Dixie Avenue
PO Box 1147
Elizabethtown, KY 42702-1147
270-982-4466

January 10, 2003

Alltel Communications
Attn: Mr. Jimmy Dolan
One Allied Drive
Little Rock, AR 72202

Dear Mr. Dolan:

Since the acquisition of the Verizon territory by Alltel, we have become extremely concerned about the status of our directory listings. On numerous occasions we have requested an alpha proof of our customers in Elizabethtown. We have yet to receive this alpha proof.

However, we did receive a list of our subscribers in a service order format from Valerie Swain on December 20, 2002. Since receiving this listing, our staff has spent numerous hours going through checking this information with our internal records. In doing so, we have found over 300 errors in this information. This is extremely alarming.

Vicki Spink, of Brandenburg Telecom, called Tana Henson about adding listings to Alltel's records that were not included in Ms. Swain's list. A couple of these listings were spot checked and were found in Alltel's OSS system. Our question now, if listings are in Alltel's OSS system, why are these listings not in Alltel's Publishing system? We have CLEC listings that were correct in both our 2002 ILEC book and the 2002 Elizabethtown Verizon book, and now there is no listing in the Alltel Publishing service order records.

Besides these potential problems in the CLEC, our ILEC publishes a telephone directory which includes the City of Elizabethtown's listings in the white pages. These Elizabethtown listings are extracted from Alltel's Publishing Department. Tana Henson has informed us that if we requested an extract from Alltel now, the information we would get in our ILEC phone book would be the information that Valerie Swain at Alltel Publishing has sent us. This is entirely unacceptable.

With Verizon, we requested and received monthly alpha proofs of these listings. We informed Verizon and these listings were corrected. When the books were published, our listings were correct. We expect no less from Alltel.

7001 1740 0004 7224 7662

mailed: Jimmy Dolan certified
Valerie Swain > reg mail
Tana Henson per RB

We thank Tana Henson and her staff for assisting us in getting these listings corrected which is currently being done. But, we demand that we receive an alpha proof from Alltel's Publishing Department by January 31, 2003 which will include the corrections that Ms. Henson's group has made to these listings. If this alpha proof is not received in the appropriate time frame, Brandenburg Telecom will have no choice except to advise the Kentucky Public Service Commission of this matter. If you have any questions, please give me a call.

Sincerely,

Randall Bradley
Randall Bradley
Controller

cc: Valerie Swain
Tana Henson

BRANDENBURG TELECOM, LLC

502 West Dixie Avenue
PO Box 1147
Elizabethtown, KY 42702-1147
270-982-4466

February 12, 2003

Mr. Jimmy Dolan
Account Manager - Wholesale Services
ALLTEL COMMUNICATIONS
1 Allied Drive
Little Rock, AR 72022

RE: Directory Listings

Dear Jimmy:

Thank you for your response to my January 10th letter regarding our ongoing difficulties with the Brandenburg Telecom, LLC listings for Elizabethtown, KY. These problems began coincident with the August 1, 2002 purchase of the Verizon - Kentucky properties by ALLTEL.

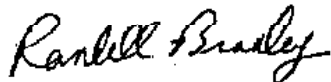
While I appreciate the difficulties that ALLTEL has experienced in the transition of these properties from Verizon, the contractual arrangements made between ALLTEL and Verizon as well as the database and other systems used by ALLTEL to support the Elizabethtown service area are wholly under the control of ALLTEL. Your claim that these problems impact ALLTEL as well as Brandenburg Telecom does nothing to mitigate the fact that through no fault of its own, Brandenburg Telecom and its customers continue to experience an unacceptable level of directory listing errors.

You have indicated in your February 3rd letter that ALLTEL hopes to have its database technical and conversion issues resolved by the end of February, a full seven months since the acquisition of the Elizabethtown exchange. We are unwilling to wait any longer. Accordingly, if we do not receive the requested alpha proof reflecting the corrections made by Ms. Henson and her staff before February 28, 2003 we will have no choice but to file a formal complaint with the Kentucky Public Service Commission regarding this matter.

Mr. Jimmy Dolan
February 12, 2003
Page 2

I may be reached at 270-982-4466.

Sincerely,

A handwritten signature in cursive script that reads "Randall Bradley".

Randall Bradley
Controller

cc: Valerie Swain
Tana Henson

DEPP, Edward

From: Stephen.Weeks@alltel.com
Sent: Wednesday, February 05, 2003 10:04 PM
To: embodamer@mindspring.com
Subject: RE: KY DA Problems

Eileen,

Thanks for the information. I'll start looking into this.

Steve

-----Original Message-----

From: Eileen Bodamer [mailto:embodamer@mindspring.com]
Sent: Wed 2/5/2003 3:18 PM
To: Weeks, Stephen
Cc:
Subject: KY DA Problems

Stephen,

Here are a collection of some of the emails discussing the DA problems. I have more but they are usually part of a string of discussion and I recall we may have others that went out from North Central directly to Jimmy that I would have missed in my cursory search.

You'll note that we have said in several places that they are being tested from an AllTel line so I am unclear where the disconnect occurred.

As further - and I think crucial - information, in my last conversation with Jimmy he also indicated that AllTel was intentionally refusing to release the companies' data to BellSouth.

If this is in fact the case, there are naturally all sorts of contractual issues to discuss particularly since as you'll see in one of the emails in October Jimmy claimed the opposite and was attempting to correct the BellSouth feed problem.

However, the statement aside, I believe that the problems with BellSouth begin with the AllTel 411 data base. If you guys lack correct information, naturally you could not provide correct info to BellSouth or anyone else.

Lastly, as I mentioned to you when we spoke, I am not sure if there isn't some sort of "411" versus "1+411" trasnlation issue. While I may be grasping at straws here, at this point I wouldn't want to play "armchair engineer" in going after these issues.

Thank you again for your involvement in this problem/ Please call me at 770-649-1886 if I can provide you any info you may not have.

Eileen Bodamer

DEPP, Edward

From: Eileen Bodamer [embodamer@mindspring.com]
Sent: Tuesday, February 11, 2003 4:32 PM
To: Stephen.Weeks@alltel.com
Subject: RE: KY DA Problems

Steve,

Anything on this?

Eileen Bodamer

-----Original Message-----

From: Stephen.Weeks@alltel.com [mailto:Stephen.Weeks@alltel.com]
Sent: Wednesday, February 05, 2003 10:04 PM
To: embodamer@mindspring.com
Subject: RE: KY DA Problems

Eileen,

Thanks for the information. I'll start looking into this.

Steve

-----Original Message-----

From: Eileen Bodamer [mailto:embodamer@mindspring.com]
Sent: Wed 2/5/2003 3:18 PM
To: Weeks, Stephen
Cc:
Subject: KY DA Problems

Stephen,

Here are a collection of some of the emails discussing the DA problems. I have more but they are usually part of a string of discussion and I recall we may have others that went out from North Central directly to Jimmy that I would have missed in my cursory search.

You'll note that we have said in several places that they are being tested from an AllTel line so I am unclear where the disconnect occurred.

As further - and I think crucial - information, in my last conversation with Jimmy he also indicated that AllTel was intentionally refusing to release the companies' data to BellSouth.

If this is in fact the case, there are naturally all sorts of contractual issues to discuss particularly since as you'll see in one of the emails in October Jimmy claimed the opposite and was attempting to correct the BellSouth feed problem.

However, the statement aside, I believe that the problems with BellSouth begin with the AllTel 411 data base. If you guys lack correct information, naturally you could not provide correct info to BellSouth or anyone else.

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